

United States Bankruptcy Court  
Eastern District of Michigan

IN RE: Jaclyn Johnson

CHAPTER 13  
CASE NO. 19-56305  
JUDGE GRETCHKO

Debtor(s).  
\_\_\_\_\_ /

Notice of Deadline to Object to Proposed Chapter 13 Plan Modification

The deadline to file an objection to the attached proposed chapter 13 plan modification is **21 days** after service.

If no timely responses are filed to a proposed post-confirmation plan modification, the proponent may file a certificate of no response and request entry of an order approving the plan modification.

If a timely objection is filed, the Court will set the matter for hearing and give notice of the hearing to the debtor, the proponent of the plan modification, the trustee and any objecting parties. In that event, the plan modification will become effective when the Court enters an order overruling or resolving all objections.

Objections to the attached proposed chapter 13 plan modification shall be served on the following:

Daniela Dimovski, Attorney at Law P.C.  
42627 Garfield Rd. Suite 213  
Clinton Township, MI 48038  
586-738-6329  
[danieladimovski@gmail.com](mailto:danieladimovski@gmail.com)

David Ruskin Chapter 13 Trustee  
26555 Evergreen Rd Ste 1100  
Southfield, MI 48076

Dated: 7/21/22

/s/ Daniela Dimovski  
DANIELA DIMOVSKI ATTORNEY AT LAW P.C.  
DANIELA DIMOVSKI (P60278)  
Attorney for Debtor  
42627 Garfield Rd. Suite 213  
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<sup>1</sup>Response or answer must comply with F.R.Civ.P. 8(b), (c) and (e)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN - DETROIT**

IN RE: Jaclyn Johnson

CHAPTER 13  
CASE NO. 19-56305  
JUDGE GRETCHKO

Debtor(s).  
\_\_\_\_\_ /

**DEBTOR'S POST-CONFIRMATION PLAN MODIFICATION**  
**REDUCING PLAN PAYMENT**

Debtors state as follows in support of this proposed plan modification:

1. This case was filed on November 18, 2019.
2. The plan herein was confirmed on February 19, 2020
3. Debtor and her now husband have had a change in income and expenses.
4. Debtor has been experiencing a lot of medical issues and is going to several appointment incurring copays and out of pocket medical costs.
5. Debtor is also experiencing the increased costs of living due to inflation.
6. Debtor requests that her plan payment be reduced to \$250.00 per month effective July 21, 2022.
7. Debtor has filed an amended schedule I and J and will provide updated income to the Trustee.
8. The Proposed modification has the following impact on the classes of creditors being paid by the Trustee as follows:
  - A. Class two administrative claims: NONE
  - B. Class four continuing claims: NONE
  - C. Class four arrearage on continuing claims: NONE
  - D. Class five (1) secured claims: NONE
  - E. Class five (2) other secured claims: NONE
  - F. Class six executory contracts/unexpired leases: NONE
  - G. Class seven priority unsecured claims: NONE
  - H. Class eight special unsecured claims: NONE
  - I. Class nine general unsecured claims: reduction

WHEREFORE, Debtor prays that the Court enter an Order Reducing her plan payment to \$250.00 per month effective July 21, 2022.

Date: 7-21-22

/s/ Daniela Dimovski  
\_\_\_\_\_  
DANIELA DIMOVSKI (P60278)  
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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN - DETROIT**

IN RE: Jaclyn Johnson

CHAPTER 13  
CASE NO. 19-56305  
JUDGE GRETCHKO

Debtor(s).  
\_\_\_\_\_ /

**ORDER GRANTING DEBTOR'S POST CONFIRMATION PLAN MODIFICATION  
REDUCING CHAPTER 13 PLAN PAYMENT**

This matter having come before the Court on Debtor's Post Confirmation Plan Modification Reducing Chapter 13 Plan Payment (Docket #?????????) and that more than TWENTY-ONE (21) days have elapsed since service and that no objections have been properly filed with the Court or received by Debtor's Counsel:

THEREFORE, IT IS HEREBY ORDERED that Debtor's payment shall be reduced to \$250.00 per month effective July 21, 2022.

# ATTACHMENT 1

## LIQUIDATION ANALYSIS AND STATEMENT OF VALUE OF ENCUMBERED PROPERTY:

TYPE OF PROPERTY	FAIR MARKET VALUE	LIENS	DEBTOR'S SHARE OF EQUITY	EXEMPT AMOUNT	NON-EXEMPT AMOUNT
PERSONAL RESIDENCE	0.00	0.00	0.00	0.00	0.00
REAL ESTATE OTHER THAN PERSONAL RESIDENCE	0.00	0.00	0.00	0.00	0.00
HHG/PERSONAL EFFECTS					
tables couches chairs beds etc	2,000.00	0.00	2,000.00	2,000.00	0.00
HHG/PERSONAL EFFECTS (total)	3,700.00	0.00	3,700.00	3,700.00	0.00
JEWELRY					
costume	100.00	0.00	100.00	100.00	0.00
JEWELRY (total)	100.00	0.00	100.00	100.00	0.00
CASH/BANK ACCOUNTS	175.00	0.00	175.00	175.00	0.00
VEHICLES	0.00	0.00	0.00	0.00	0.00
OTHER (itemize)	0.00	0.00	0.00	0.00	0.00

Amount available upon liquidation .....	\$	0.00
Less administrative expenses and costs .....	\$	0.00
Less priority claims .....	\$	0.00
Amount Available in Chapter 7 .....	\$	0.00



ATTACHMENT 2

CHAPTER 13 MODEL WORKSHEET  
LOCAL BANKRUPTCY RULE 3015-1(B)(2) E.D.M

1.	Proposed length of Plan: <u>60</u> months	
2.	Initial Plan Payment: \$625.32 per month x 60 months = \$37,519.20 (subtotal)	
3.	Additional Payments: \$ _____ per=(subtotal)	_____
4.	Lump sums payments	<u>\$0.00</u>
5.	Total to be paid into Plan (total of lines 2 through 4)	<u>\$37,519.20</u>
6.	Estimated disbursements other than to Class 9 General Unsecured Creditors	
a.	Estimated Trustee Fees	<u>\$2,626.20</u>
b.	Estimated Attorney Fees and costs through confirmation of plan	<u>\$0.00</u>
c.	Estimated Attorney Fees and costs post-confirmation through duration of Plan	<u>\$3,000.00</u>
d.	Estimated fees of other Professionals	<u>\$0.00</u>
e.	Total mortgage and other continuing secured debt payments	<u>\$0.00</u>
f.	Total non-continuing secured debt payments (including interest)	<u>\$0.00</u>
g.	Total priority claims	<u>\$0.00</u>
h.	Total arrearage claims	<u>\$0.00</u>
7.	Total disbursements other than to Class 9 General Unsecured Creditors (Total of lines 6.a through 6.h)	\$ <u>5,626.20</u>
8.	Funds <i>estimated</i> to be available for Class 9 General Unsecured Creditors (Line 5 minus Line 7)	\$ <u>31,893.00</u>
9.	Estimated dividend to Class 9.General Unsecured Creditors in Chapter 7 proceeding (see Liquidation Analysis on page 6)	\$ <u>0.00</u>

COMMENTS: